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**THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

Lead Case No. 2:23-cv-07498

*In re: Vivendi Ticketing US LLC,
d/b/a See Tickets Data Security
Incident*

**PLAINTIFFS' NOTICE OF
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

DATE: June 17, 2024
TIME: 1:30 pm
COURTROOM: 9 B
JUDGE: Hon. Cormac J. Carney

**TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF
RECORD:**

PLEASE TAKE NOTICE THAT on June 17, 2024 at 1:30 p.m., or as soon thereafter as counsel may be heard, before the Honorable Cormac J. Carney, Ronald Reagan Federal Building and United States Courthouse, 411 West Fourth Street, Courtroom 9 B, Santa Ana, CA, 92701-4516, Plaintiffs will and hereby do move this Court, pursuant to Federal Rule of Civil Procedure 23, for an order granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement.

Plaintiffs base their Motion for Preliminary Approval of Class Action Settlement (their "Motion") on: this Notice; the Memorandum of Points and Authorities filed in support thereof; the Settlement Agreement and Release ("Settlement Agreement") and all exhibits attached thereto; the Declaration of Mason A. Barney in Support of Plaintiffs' Motion for Preliminary Approval of the Class Action Settlement; all other records and papers on file in this action; any oral argument on their Motion; and all other matters properly before the Court.

Plaintiffs seek an order pursuant to Federal Rule of Civil Procedure 23(b)(3) certifying the Settlement Class more fully described in the Settlement Agreement, filed concurrently herewith; preliminarily approving the settlement as fair, reasonable, and adequate; directing notice to be disseminated to the Settlement Class in the form and manner proposed by the parties as set forth in the Settlement Agreement and attached as Exhibits A and B thereto; appointing Kroll Settlement Administration LLC to serve as the Settlement Administrator; appointing Plaintiffs as Class Representatives and their attorneys as Class Counsel; and setting a hearing date and schedule for final approval of the settlement and consideration of Class Counsel's forthcoming motion for an award of fees, costs, expenses, and service awards.

This Motion is made following the conference of counsel pursuant to L.R. 7-3 which took place at the mediation held on March 11, 2024, and during discussions

1 pertaining to the settlement held at numerous times and on numerous dates
2 thereafter. Defendant does not oppose certification of the Settlement Class solely
3 for purposes of settlement.

4
5 DATED: May 24, 2024

Respectfully Submitted,

6 /s/ Mason A. Barney

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26 *the Proposed Classes*
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